

F. Robert Reeder (2710)  
William J. Evans (5276)  
PARSONS BEHLE & LATIMER  
201 South Main Street, Suite 1800  
P.O. Box 45898  
Salt Lake City, Utah 84145-0898  
Telephone: (801) 532-1234

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

\* \* \* \* \*

In the Matter of the Investigation Into the	)	
Reasonableness of the Rates and Charges of	)	<b>DOCKET NO. 99-035-10</b>
PACIFICORP, dba UTAH POWER &	)	
LIGHT COMPANY	)	<b>PETITION TO INTERVENE</b>
	)	
	)	
	)	

\* \* \* \* \*

In accordance with Rule 756-100-6 of the Public Service Commission’s Rules of Practice and Procedure and the provisions of Utah Code Ann. § 63-46b-9, Abbott Critical Care, Fairchild Semiconductor Corporation, Holnam, Inc., Kennecott Utah Copper Corporation, Kimberly-Clark Corporation, Micron Technology, Inc., Praxair, Inc., and Westinghouse/Western Zirconium Division, (hereinafter and throughout the course of this proceeding referred to as “Utah Industrial Energy Consumers” or “UIEC”), hereby move the Commission for leave to intervene in the above-referenced proceeding.

In support of this petition to intervene, the UIEC state as follows:

1. On application by PacifiCorp, doing business as Utah Power and Light (“UP&L”), the Commission has commenced a formal investigation into the reasonableness of adjusting

UP&L's rates and charges.

2. The UIEC are a group of customers who take service from UP&L under rate Schedule 9 or under special contracts.

3. The UIEC have a direct, immediate and substantial interest in this proceeding as customers of UP&L because the rate they pay for electric service and their willingness to continue service arrangements may be affected by a decision of the Commission regarding UP&L's rates and tariffs.

4. The interests of the UIEC will not be adequately represented by any other party to this proceeding.

5. If the UIEC is granted intervention, they hereby request that service of all pleadings, notices, etc., be made to the following:

F. Robert Reeder  
William J. Evans  
Parsons Behle & Latimer  
201 South Main Street, Suite 1800  
Salt Lake City, Utah 84145-0898

6. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the UIEC's intervention.

7. The UIEC have not yet determined the precise nature of the relief they will seek, and request that the Commission grant them intervention as their interests may appear.

WHEREFORE, the UIEC requests that the Public Service Commission enter an order permitting the UIEC intervene in this docket, and to participate to the full extent allowed by the law and the Commission's rules.

DATED this 1<sup>st</sup> day of November, 1999.

PARSONS BEHLE & LATIMER

---

F. Robert Reeder  
William J. Evans  
Attorneys for UIEC

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 1999, I caused to be mailed, first class, postage prepaid, a true and correct copy of the foregoing **PETITION TO INTERVENE**, to:

Michael Ginsberg  
Assistant Attorney General  
Utah Division of Public Utilities  
160 East 300-South  
Salt Lake City, Utah 84111

Edward A. Hunter  
Stoel Rives Boley Jones & Grey  
201 S. Main St., #1100  
Salt Lake City, Utah 84111

Lee R. Brown  
Vice President, Contracts, Human Resources,  
Public & Government Affairs  
Magnesium Corporation of America  
238 North 2200 West  
Salt Lake City, Utah 84116

Brian W. Burnett  
Callister, Nebeker & McCullough  
10 East South Temple, #800  
Salt Lake City, Utah 84133

Doug Tingey  
Assistant Attorney General  
Committee of Consumer Services  
160 East 300 South  
Salt Lake City, Utah 84111

Glen E. Davies/David Schofield  
Parsons, Davies, Kinghorn &  
Peters, P.C.  
185 South State Street, Suite 700  
Salt Lake City, Utah 84111

Peter J. Mattheis  
Matthew J. Jones  
Brickfield, Burchette & Ritts, P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 20007

Dr. Charles E. Johnson  
The Three Parties  
1338 Foothill Boulevard, Suite 134  
Salt Lake City, Utah 84108

Stephen R. Randle/Thomas Zarr  
Randle, Deamer, Zarr, Romrell & Lee, P.C.  
139 East South Temple, Suite 330  
Salt Lake City, Utah 84111-1004

Daniel Moquin  
Assistant Attorney General  
1594 West North Temple, Suite 300  
Salt Lake City, Utah 84116

Gary Dodge  
Parr, Waddoups, Brown, Gee & Loveless  
185 South State Street, Suite 1300  
Salt Lake City, Utah 84111-1536

Eric Blank  
Land and Water Fund of the Rockies  
2260 Baseline, Suite 200  
Boulder, Colorado 80302

E. A. Prawitt  
Utah Association of Counties  
5397 South Vine Street  
Salt Lake City, Utah 84107

Dr. Robert Malko  
The Matheson Group  
466 East 500 South, Suite #200  
Salt Lake City, Utah 84111

Douglas O. Hunter  
General Manager  
Utah Associated Municipal Power Systems  
2825 East Cottonwood Parkway, Suite 200  
Salt Lake City, Utah 84121

Arthur F. Sandack (#2854)  
Attorney for Petitioner, IBEW  
8 East Broadway, Suite 620  
Salt Lake City, Utah 84111

Curtis Broadbent  
Controller  
Nucor Steel  
P.O. Box 100  
Plymouth, Utah 84330

Roger O. Tew  
60 South 600 East, Suite 200  
Salt Lake City, UT 84102

Steven W. Allred  
Salt Lake City Law Department  
451 South State Street, Suite 505  
Salt Lake City, Utah 84111

David F. Crabtree  
Deseret Generation & Transmission  
Co-operative  
5295 South 300 West, Suite 500  
Murray, Utah 84107

Matthew F. McNulty, III  
VanCott Bagley Cornwall & McCarthy  
50 South Main Street, Suite 1600  
P.O. Box 45340  
Salt Lake City, Utah 84145

Paul T. Morris  
3600 Constitution Boulevard  
West Valley City, Utah 84119

Brian L. Farr  
Assistant Attorney General  
160 East 300 South  
P.O. Box 140857  
Salt Lake City, Utah 84114-0857

---